

# EXHIBIT B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP,

*Defendant.*

No. 22 Civ. 10016 (LAK)

**[PLAINTIFF'S PROPOSED] SPECIAL VERDICT FORM**

**Claim One: Battery**

1. Has Ms. Carroll proved, by a preponderance of the evidence, that Mr. Trump committed a battery?

Yes \_\_\_\_\_ No \_\_\_\_\_

*[If "Yes," proceed to question two. If "No," skip to question five.]*

2. Has Ms. Carroll proved, by a preponderance of the evidence, that Mr. Trump engaged in conduct that would constitute:

- a. Forcible Touching?

Yes \_\_\_\_\_ No \_\_\_\_\_

- b. Sexual Abuse?

Yes \_\_\_\_\_ No \_\_\_\_\_

- c. Rape?

Yes \_\_\_\_\_ No \_\_\_\_\_

*[If "Yes" to a, b, or c, proceed to questions three and four. If "No," skip to question five.]*

3. Indicate on the line below how much you award in compensatory or nominal damages.

\$ \_\_\_\_\_

4. Indicate on the line below how much you award in punitive damages.

\$ \_\_\_\_\_

**Claim Two: Defamation**

5. Has Ms. Carroll proved:

- a. By a preponderance of the evidence that Mr. Trump's statement was defamatory?

Yes \_\_\_\_\_ No \_\_\_\_\_

- b. By a preponderance of the evidence that Mr. Trump's statement would be reasonably understood to be about her?

Yes \_\_\_\_\_ No \_\_\_\_\_

- c. By a preponderance of the evidence that Mr. Trump published the statement?

Yes \_\_\_\_\_ No \_\_\_\_\_

- d. By clear and convincing evidence that Mr. Trump's statement was false?

Yes \_\_\_\_\_ No \_\_\_\_\_

- e. By clear and convincing evidence that Mr. Trump made the statement with actual malice?

Yes \_\_\_\_\_ No \_\_\_\_\_

*[If "Yes" to all of the above, proceed to questions six and seven. If "No," stop here and return your verdict.]*

6. Indicate on the line below how much you award in compensatory or nominal damages.

\$ \_\_\_\_\_

7. Indicate on the line below how much you award in punitive damages.

\$ \_\_\_\_\_

Dated: \_\_\_\_\_, 2023.

Signatures:

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